

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

TYCO HEALTHCARE GROUP LP

Plaintiff,

v.

MEDICAL PRODUCTS, INC.

Defendant.

Civil Action No. 1:04-cv-11524-DPW

AFFIDAVIT OF MELISSA OWENS

I, Melissa Owens, being duly sworn, hereby state:


1. I am employed as the information technician for Medical Products, Inc. ("MPI" or "the company"), the defendant in the above-captioned case. Except where otherwise indicated, I make the following statements on the basis of my personal knowledge.

2. I have worked at MPI since the Summer of 2004. My responsibilities include the operation and maintenance of MPI's computers server and network. I am familiar with the Synchronic computer software, which MPI uses, among other reasons, to maintain purchasing and sales information for medical products distributed by the company.

3. MPI's network and server are only accessible to MPI employees, through the computers on-site at our offices located in Ripley, Mississippi. To access the network and server, employees must enter a valid username and confidential password. Each employee has his or her own username and confidential password. The usernames and passwords are terminated when an employee leaves MPI.

4. Synchronics is a searchable database that generates reports including "Ticket History Reports." The names and identities of MPI's customers are accessible through Synchronics.

SIGNED UNDER THE PENALTIES OF PERJURY, this 27th day of January, 2005.


Melissa Owens